Sponsoring organizations are required to maintain records to support the monthly claim for reimbursement and compliance to Program regulations. <u>All CACFP records must be stored at a central location identified in the sponsoring organization management plan and available for audit within one hour of the BCFNA reviewer's arrival.</u> All records shall be retained for a period of three years after the date of submission of the final claim for the fiscal year to which they pertain. If audit findings have not been resolved, the records shall be retained beyond the end of the three year period as long as may be required for the resolution of the issues raised by the audit.

The sponsoring organization shall retain the following records in a **central location** identified in the management plan:

Copies of all menus. Menus must be <u>dated</u> and indicate all <u>components</u> served. Each facility must verify that the menu served to the children meets at least the minimum meal pattern requirement. Food purchase receipts and invoices will be reviewed to ensure adequate food and milk purchases are made and that the receipts support the menu.

Resident Rosters. All children claimed for reimbursement must be residents of the shelter. Shelters must maintain a master listing of residents*, age, date they entered the shelter, date they left the shelter, and the signature of the director to verify the information. It is recommended that a new roster be completed each month.

Meals served in congregate settings (group settings) to children who are residing in a shelter may be claimed for reimbursement. Although the shelter may serve meals to children who do not reside there and/or program or non-program adults, these meals are not reimbursable under the Program. The shelter will have to differentiate between children residing in the shelter and those who may be served meals as "walk-ins."

Children 18 years of age and younger are eligible to participate in the CACFP. Individuals with disabilities, regardless of age, may also receive free meals and snacks at the shelters where they reside.

Meals that are consumed in private family quarters in a shelter are not reimbursable. Only meals served in congregate meal settings are eligible for reimbursement. An exception may be made for infants 0 through 11 months of age served in private family quarters that are part of a shelter. Those meals may be reimbursable if the shelter provides all of the required meal components to the parents or guardians, and maintains records documenting that sufficient food was provided to meet the minimum meal pattern requirements for infants.

Meal Count Records. Daily meal count records must be maintained for each qualified participant who resides in the shelter. The Resident Rosters should support the meal count records. For example, if John Doe was claimed for a meal on May 17, the meal count record should indicate that John Doe was present on May 17. The Resident Roster should also indicate he was a resident on that date. The meal count record

must indicate the daily number of meals served by type of meal (breakfast, lunch, supper, or snack). Shelter personnel must maintain a point of service meal count, which means that each meal is recorded on the meal count record as the meal is served to each participant. A maximum of three meals OR two meals and one snack may be claimed per day per participant in attendance seven days a week.

Copies of most recent fire safety inspection and sanitation inspection.

Non-Profit Food Service Verification. The shelter must have documentation to verify that all of the CACFP reimbursement is being used solely for conducting or improving food service operations. Non-profit food service verification includes:

   a. **Documentation of income to the program**. Income to the Program includes all monies received from State, Federal, or local government sources, any shelter funds used to subsidize the food service program, and payments for adult meals, and any other income including loans and donations to the food program.

   b. **Documentation of food service expenditures**. Food service expenditures include food purchase receipts or invoices lists of donated food items, labor costs supported by payroll stubs or time studies, cost of expendable food service equipment, cost of maintaining non-expendable food service equipment, and indirect costs. **Expendable equipment** has a durability of less than two years and costs $500 or less. **Non-expendable equipment** has a durability of two years or more and costs more than $500. Examples of indirect costs are rent, utilities, office supplies, etc. A portion of indirect costs can be charged to the CACFP if there is documentation available to support the charge.

   See Section 8.2 for more information on records to support Program costs.

Civil Rights racial/ethnic data. All shelters must:

   a. Display an "And Justice For All" poster in a location visible to the public;
   b. Provide the nondiscrimination statement and procedure for filing a complaint in all shelter brochures;
   c. Collect actual beneficiary data by racial/ethnic category;
   d. Provide informational materials in the appropriate translation regarding the CACFP; and
   e. Display a "Building for the Future" poster in a location visible to the public.

   See Sections 5.5 and 5.6 for more information on Civil Rights.

Documentation of training. Staff must receive training at least annually with regard to the CACFP. Documentation must include:

   a. Session dates
   b. Locations
   c. Topics
   d. Names of participants

A minimum training must include instruction appropriate to the level of staff experience and duties. The training must include Program's meal pattern, meal counts, claims submission and review procedures, recordkeeping requirements and the reimbursement system.

Documentation of Monitoring. Shelters under the sponsoring organization's jurisdiction must be monitored by the Sponsoring Organization for Program compliance at least three times annually. At least two of the monitoring visits must be unannounced and at least two must include a complete meal service. Date of the review, problems noted and corrective action prescribed must be documented. The sponsor shall review the meal pattern, meal counts, menu, sanitation inspection report and training records.

Documentation of the dates and amounts of disbursement to each shelter. Disbursements of reimbursement to shelters shall be made within five working days from acknowledgement of claim deposit from the Missouri Department of Health and Senior Services – Community Food and Nutrition Assistance (MDHSS-CFNA) to shelters under the sponsoring organization's jurisdiction if the shelter(s) is not under the same legal entity as the sponsoring organization. Separate disbursement need not be provided to shelters that are part of the same legal entity as the sponsor.

Miscellaneous documentation. The following miscellaneous documentation must be retained:

a. Documents submitted to the Missouri Department of Health and Senior Services – Bureau of Community Food and Nutrition Assistance; and

b. The program services contract.

See Chapter 8 for more information on recordkeeping and the booklet entitled *Recordkeeping* for the Emergency/Homeless Shelters for sample forms and instructions.

*Per the Stewart B. McKinney Homeless Assistance Act, a victim service provider may not disclose "personally identifying information" or "personal information" about an individual including: a first and last name; a home or other physical address; contact information; a social security number; any other information, including date of birth, racial or ethnic background, or religious affiliation, that, in combination with any other non-personally identifying information would serve to identify any individual.